



**PARDALIS & NOHAVICKA, LLP**  
ATTORNEYS

**Via ECF**

July 1, 2020

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HON. ANNE Y. SHIELDS  
Magistrate Judge  
United States District Court  
Eastern District of New York  
100 Federal Plaza  
Central Islip, NY 11722

Re: Unique Importer & Distributor, Inc. v. Sterling Seafood Corp. et al.  
2:19-CV-03883-JMA-AYS

Dear Judge Shields,

This law firm represents Unique Importer & Distributor, Inc., Plaintiff in the above-referenced matter. Please allow this correspondence to serve as the parties Joint Status Letter pursuant to Your Honor's Order dated February 26, 2020. Following the parties' counsels' request, Your Honor granted an extension of time for the parties to submit the Joint Status Letter to July 1, 2020.

Pursuant to Your Honor's Order dated February 26, 2020:

- Defendants Sterling Seafood Corp., Cherians International Fresh Market, LLC, Easo Enterprises Corp. d/b/a National Imports (incorrectly sued as "National Imports LLC"), Geetha Foods, Inc. (incorrectly sued as "MGM Geeth Foods Inc."), Golden Ocean Seafood Inc., Imaex Trading Co., Matha, Inc. d/b/a Tampa Grocery, Palli Trading Inc./ Zoya USA Inc. and Smart Chef Supply Inc. have produced to

Plaintiff their respective available shipping documents for the time period of October 2017 to the present that pertaining to the “Neela” trademark or that bear the “Neela” logo;

- The out-of-state Defendants, P & P Delights, Inc. d/b/a/ P&P Asian Foods (incorrectly sued as "P&P Asian Foods, Inc.") and TT Asian Delights, Inc. d/b/a TT Asian Grocery (incorrectly sued as " TT Asian Grocery, Inc.") do not have any relevant shipping documents in their possession relevant to the “Neela” brand;
- Plaintiff and Defendant Sterling Seafood Corp. have exchanged all documents pertaining to an agreement between Plaintiff and Sterling, or an intent to agree, as well as any documents pertaining to the validity and/or ownership of Plaintiff’s trademark;
- Plaintiff updated and served its amended requests for production (as and as for limited jurisdictional discovery) on the out-of-state Defendants and the out-of-state Defendants have responded to the same. Plaintiff reserves the right to object to the out-of-state Defendants' responses to the amended request for production;
- Defendant Sterling Seafood Corp. intends to move this court for leave to amend its counterclaim to add Mr. Islam as a party.
- Defendants Palli Trading Inc., Zoya USA Inc. and Smart Chef Supply Inc. intend to bring a motion to dismiss the complaint for failure to join a necessary party, and for failure to state a claim.
- The out-of-state Defendants, Cherians International Fresh Market, LLC, Easo Enterprises Corp. d/b/a National Imports, Geetha Foods, Inc., Golden Ocean Seafood Inc., Matha, Inc. d/b/a Tampa Grocery, , P & P Delights, Inc. d/b/a/ P&P

Asian Foods and TT Asian Delights, Inc. d/b/a TT Asian Grocery intend to proceed with their motion to dismiss the complaint for lack of personal jurisdiction.

At this time, the parties are ready to proceed with the litigation and await further instruction from the Court.

Respectfully submitted,  
**PARDALIS & NOHAVICKA, LLP**

/s/ Eleni Melekou  
ELENI MELEKOU, ESQ.